

Subject: RIN-1010-AD30

To: rules.comments@mms.gov

February 28, 2006

Department of Interior Mineral Management Services

ATTN: Rules Processing Team

381 Elden Street

MS-4024

Herndon, Virginia 20170-4817

RE: Alternate Energy-Related Uses on the Outer Continental Shelf-RIN "1010-AD30"

To Whom It May Concern:

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1. The nature of the marine environment is such that any human activity that affects the habitat of a species in one area can also affect life cycles, migration patterns, etc., of that species in other areas where it travels, spawns, etc. Depending on the species, this multi-area impact can span very long distances. For this reason regulations must call for a comprehensive review to identify any and all inter-related impacts incurred by all projects planned or occurring within the entire area under jurisdiction.

For this reason also, any currently proposed projects, specifically the Long Island Offshore Wind Farm, should be placed on hold until this jurisdiction-wide comprehensive review process is completed. To allow activity to continue in any area under comprehensive review during the review process could skew what is observed in other areas, and thereby corrupt the data collected and conclusions derived.

2. The savings clause in the enabling legislation (Section 388 of the EPA2005) that protects applicants from having to duplicate any actions already undertaken with regard to a project/permit process commenced prior to the transfer of jurisdiction from the ACE to MMS, should not be interpreted in any way that would exempt future activity stemming from that project/permit process from compliance with the proposed MMS regulatory scheme and comprehensive review.

Failure to impose a moratorium on existing project activity until the comprehensive study is completed would risk incurring negative environmental impacts of unknown extent before

the possibility of such negative impacts could be discovered, assessed, and ameliorated. It would be a classic case of shutting the barn door after the horse has escaped.

Thank you for the opportunity to comment.